

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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|---------------------------------|---|---------------------------------|
| UNITED STATES OF AMERICA | : | Crim. No. 2:18-CR-101-12 |
| | : | |
| vs. | : | |
| | : | |
| SAMANTHA HOLLIS et al | : | |
| | : | |

DEFENDANT’S MOTION TO JOIN PRE-TRIAL MOTIONS FILED BY CO-COUNSEL

TO THE HONORABLE GENE E.K. PRATTER, JUDGE, UNITED STATES EASTERN DISTRICT OF PENNSYLVANIA, PHILADELPHIA:

COMES NOW the defendant, Samantha Hollis, through her attorney Lawrence J. Bozzelli, Esquire, and makes the request to join the following pre-trial motions filed by co-counsel and averts the following:

- 1) Motion In Limine To Limit Expert Testimony To A Proper Testimonial Format And Opinions Disclosed In Accordance With Rule 16(A)(1)(G) [Docket #392]
- 2) Motion in Limine to Preclude (1) References to "Illegal" or "Criminal" Prescriptions and (2) the Term "Reasonable Medical Certainty" [Docket #393]
- 3) Motion to Exclude Co-Defendants' Statements Pursuant to *United States v Bruton* [Docket #399]

WHEREFORE, it is respectfully requested that this Honorable Court enter an Order granting the defendant Samantha Hollis permission to join the above listed pre-trial motions and incorporate the defense arguments contained therein.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'LJ Bozzelli', with a stylized flourish at the end.

LAWRENCE J. BOZZELLI
Attorney for Samantha Hollis

CERTIFICATE OF SERVICE

I, Lawrence J. Bozzelli, attorney for Ms. Hollis, hereby certify that I have served copies of the Defendant's Motion for Joinder via PACER/e-mail to (1) Mary Costello, Assistant United States Attorney, and (2) the Honorable Gene E.K. Pratter on the below listed date.



LAWRENCE J. BOZZELLI
Attorney for Samantha Hollis

DATE: May 12, 2022